

# Hazardous Waste: Your Business Responsibilities

DNR Publication WA-294-06



P.O. Box 7921  
Madison, Wisconsin  
53707-7921

## *Small Quantity Generator Basic Requirements*

*Many businesses find it difficult to juggle their daily affairs and still have time to keep up with the regulations that affect them. This brief publication, though not a substitute for reading the actual regulations\*, may help businesses **responsibly manage small quantities of hazardous waste.***

*First make sure your waste is indeed hazardous, by using your knowledge about the waste you generate, or by having your waste tested by a certified laboratory. If your waste is hazardous and if you generate more than 220 pounds but less than 2,205 pounds in any month, your business is considered to be a “Small Quantity Generator” (SQG). A SQG should never accumulate more than 13,230 pounds. (Use this rule of thumb to estimate how much waste you generate: Two hundred twenty (220) pounds of liquid waste is approximately half of a 55-gallon drum.)*

**While accumulating waste, small quantity generators are required to do the following:**

- Notify DNR that you are a SQG of hazardous waste and apply for an EPA identification number. The Notification of Hazardous Waste Activity form 8700-12 can be obtained from: <http://www.epa.gov/epaoswer/hazwaste/data/form8700/forms.htm>. The completed form should be sent to Notification Processing, WI

Department of Natural Resources, P.O. Box 7921, Madison, WI 53707.

- Keep track of how much waste you produce.
- SQGs should never accumulate more than 13,230 pounds (roughly equal to 26 55-gallon drums) of hazardous waste on-site at any time. SQGs that either exceed the monthly generation limit of 2,205 pounds or on-site accumulation amount of 13,230 pounds become subject to more stringent regulations.
- Keep the lid on drums when you are not removing or adding waste to them.
- Transfer waste to another container if it is not in good condition or begins to leak.
- Use containers that are compatible with the waste you are accumulating.
- Separate incompatible wastes by storing them away from each other or constructing berms or dikes.
- Label your drums with the words, “Hazardous Waste”.
- Mark each drum with the date that you first place hazardous waste in it. SQGs must make arrangements for proper shipping within 180 days of when the waste is generated. Waste that must be shipped 200 miles or more can be accumulated on-site for up to 270 days. Time extensions may be available.
- Each week, inspect the areas where hazardous waste is stored. Ensure that the containers are properly closed and labeled, and are not leaking.
- Fill out annual DNR reports.
- Maintain aisle space between the drums.

- Designate an emergency coordinator and post emergency contact information next to all telephones.
- Have procedures in place in case of an emergency, including telephone or alarm systems to call for assistance and procedures for responding to a fire, spill or explosion.
- Develop an internal training program on safe management practices.
- Keep copies of all records for three years. These include, but may not be limited to, waste determinations, manifest copies, LDR forms and annual reports.
- Keep a copy of all manifests for 3 years from the date the waste is shipped.
- If you ship waste out-of-state, send a copy of the manifest signed by the treatment, storage or disposal facility to WI Department of Natural Resources, Bureau of Waste and Materials Management, P.O. Box 8094, Madison, WI 53708.
- Comply with land disposal requirements, which may include a requirement that your waste must be treated before it is landfilled.
- Arrange with a State of Wisconsin licensed hazardous waste transporter to take your waste to a licensed treatment, storage or disposal facility. Your licensed transporter may be able to help you with the manifest and land disposal notification paperwork.

*Satellite Accumulation Areas: Hazardous waste containers that are filled at or near the point of generation and under operator control can be considered satellite accumulation areas. Satellite containers must be marked with the date when an excess of 55 gallons is accumulated in the satellite area and must be moved within 3 days to the 180 day accumulation area. Satellite accumulation containers must be in good condition, closed when waste is not be added or removed and labeled as containing hazardous waste. SQGs benefit from satellite accumulation areas when small quantities of waste are generated.*

*Remember, a small generator may not accumulate waste for more than 180 days from generation or accumulate more than 13,230 pounds. A generator may accumulate waste up to 270 days if the waste must transported 200 miles or more.*

**When shipping waste, small quantity generators are required to do the following:**

- Prepare and sign a hazardous waste manifest form.\*\* This form certifies your responsibility for the waste and it must accompany all hazardous waste shipments. Your signature on the manifest certifies that you have provisions in place to reduce your hazardous waste generation.

*SQGs that enter a contractual agreement to reclaim hazardous waste are not subject to manifest requirements if:*

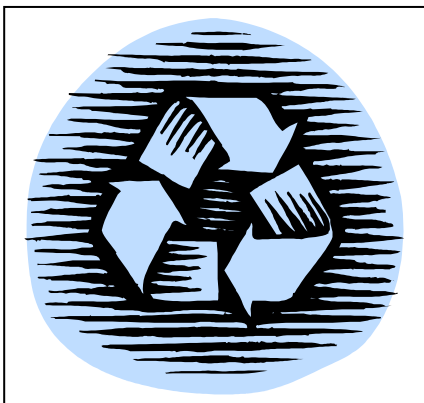
- ✓ *The agreement specifies the type of waste reclaimed and the frequency of shipments.*
- ✓ *The vehicle transporting the waste to and from the generator is owned by the reclaimer.*
- ✓ *The generator keeps a copy of the reclamation agreement for 3 years after it expires.*

**Less waste means less regulation!!!!!! ☺**

DNR wants to hear success stories from businesses of all sizes that are able to reduce their hazardous waste generation and save money simultaneously. Other companies might benefit from your experiences. Wisconsin also supports several recognition awards for businesses that generate less waste.

Many waste reduction options are available. Contact your local DNR hazardous waste specialist for details. (See next page.)

**Remember, you are responsible for your waste, from the point of generation through proper treatment, storage or disposal.**



- Northern Region, Rhinelander  
715/365-8900
- Northern Region, Spooner  
715/635-2101
- Southcentral Region, Fitchburg  
608/275-3266
- Southeast Region, Milwaukee  
414/263-8500
- West Central Region, Eau Claire  
715/839-3700

#### NOTES

\* Wisconsin's hazardous waste regulations are contained in chs. NR 660-679, Wis. Adm. Code, available on the Web at <http://www.dnr.state.wi.us/org/aw/wm/information/wiacssh.htm>

Or contact a waste management specialist. (See the information provided below.)

\*\* The Hazardous Waste Manifest (Pub. WA-102-06) is available on the web at [http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa\\_102.pdf](http://www.dnr.state.wi.us/org/aw/wm/publications/hazard/wa_102.pdf)

*The Wisconsin Department of Natural Resources provides equal opportunity in its employment, programs, services and functions under an Affirmative Action Plan. If you have any questions, please write to Equal Opportunity Office, Department of Interior, Washington, D.C. 20240.*

*This publication is available in alternative format upon request. Please call (608) 266-2111 for more information.*

*This document is intended solely as guidance and does not include any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any manner addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*

For more information, look up the DNR Bureau of Waste and Materials Management's website at <http://www.dnr.state.wi.us/org/aw/wm/index.htm> or call 608/266-2111.

Or contact the waste management staff at these DNR regional offices:

- Northeast Region, Green Bay  
920/662-5100